



Organic Handling System Plan Brokerage-Marketing Company

BUSINESS NAME:

WSDA ORGANIC CERTIFICATION NUMBER
(RENEWAL APPLICANTS ONLY):

COUNTY WHERE BUSINESS IS LOCATED:

STATE WHERE BUSINESS IS LOCATED:

Please provide directions to your facility or company location:

SECTION A. GENERAL INFORMATION [NOP 205.201 and 205.401]

The National Organic Program (NOP) requires all operations seeking certification to develop an organic system plan that is agreed to by the certified operation and an accredited certifying agent. A certified operation must update this system plan on an annual basis in order to verify continued compliance.

The organic system plan must include the following:

- A description of practices and procedures - including the frequency with which they will be performed,
- A list and detailed information regarding each substance to be used in organic handling,
- A description of the monitoring practices and frequency the practices will be performed,
- A description of the recordkeeping system that complies with the rule,
- A description of the practices in place to prevent commingling of organic and non-organic products,
- A description of the practices in place to prevent contamination of organic products with prohibited substances,
- Any additional information required by the certifying agent in order to evaluate compliance.

1. Do you have a copy of the National Organic Standards? ☐ Yes ☐ No

2. Are you a New Applicant? ☐ Yes ☐ No

2a. If, "No," what was the first year you were certified by WSDA Organic Food Program?

3. Have you previously *applied* for organic certification? ☐ Yes ☐ No

3a. If, "Yes," please list the certification agency, the year the application was made, and the outcome of the application.

4. If currently, or previously certified, did you receive a Notice of Noncompliance or a letter notifying you that in order to maintain organic certification conditions must be met? ☐ Yes ☐ No ☐ N/A

4a. If, "Yes," please list the noncompliance(s) or condition(s) and state how the issues have been resolved.



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| 5. Have you ever been denied certification or had your certification suspended or revoked? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 5a. If "Yes," please describe the circumstances: | | | |
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| 6. Are you currently certified by an agency Other than WSDA Organic Food Program? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | |
| 6a. If, "Yes," please list the name of the agency and the first year certified by that agency: | | | |
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SECTION B. COMPANY OVERVIEW CHAIN OF CUSTODY

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| 1. Does your company own the organic products that are handled by your company? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Own some/Custom handle some |
| 1a. If "Yes," at what point do you take ownership of the products? | | | |
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| 2. Please indicate your estimated annual handling of food products? | % Organic | | % Non-organic/conventional |
| 3. Does your company handle, or plan to handle, the same product in both an organic and conventional form? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | |
| 3a. If "Yes," please provide a list of the products that are handled in an organic and conventional form. <i>Please attach a separate sheet of paper if necessary.</i> | | | |
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| 4. Does your company have its own marketing label or brand name for organic products? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | |
| 4a. If "Yes," please provide the name or names of the marketing label or brand name: | | | |
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| SUB-CONTRACTS | | | |
| 5. Does your company plan to contract with any farms or other handling facilities to produce, process, store, or label organic products? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | |



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5a. If "Yes," please complete the table below. *Please attach a separate sheet of paper if necessary.*

| Contract Farm or Company Name | Address | Phone No. | Organic Certification Agency of Farm or Contracted Company |
|-------------------------------|---------|-----------|--|
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6. Please indicate how organic products handled by your company are marketed. Please check all that apply.

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| <input type="checkbox"/> Bulk Sales to Food Processors | <input type="checkbox"/> Export to European Countries |
| <input type="checkbox"/> Retail or Bulk Sales to Food Distributors or Retail Stores | <input type="checkbox"/> Export to Japan |
| <input type="checkbox"/> Direct Sales to Consumers | <input type="checkbox"/> Other (please specify): |

7. Is your company responsible for creating product formulations or for sourcing ingredients for organic products processed or handled by another company?

☐ Yes

☐ No

7a. If "Yes," move onto Section C - Product Composition and Ingredient Verification.

7b. If "No," please skip Section C and move onto Section D – Harvest and Transportation of Organic Crops.

SECTION C. PRODUCT COMPOSITION AND INGREDIENT VERIFICATION [NOP Sub-part D]

The NOP Rule has specific requirements regarding organic product composition.

- Products labeled "100% organic" must contain 100% organic ingredients, including processing aids.
- Products labeled "organic" must contain at least 95% organic ingredients; non-organic ingredients must not be commercially available in an organic form; and all synthetic ingredients and processing aids must be on the National List.
- Products labeled "made with organic (specified ingredients or food groups)" must contain at least 70% organic ingredients.
- For "100% organic," "organic," and "made with...." products, both organic and non-organic ingredients must not be produced using excluded methods, sewage sludge, or ionizing radiation.
- Products labeled "100% organic," "organic," and all ingredients identified as "organic" in the ingredient statement of a product must not include organic and non-organic forms of the same ingredient, must not contain sulfites, nitrates, or nitrites added during the production or handling process, and must not contain a volatile synthetic solvent or other synthetic processing aid not allowed under section 205.605 of the National List.



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| 1. How do you prevent the use of ingredients or processing aids that have been produced using genetically modified organisms (GMOs), sewage sludge, or ionizing radiation? Please check all that apply. | | | |
| <input type="checkbox"/> Only using certified organic ingredients, products, or processing aids | <input type="checkbox"/> WSDA affidavits (Please see the attached form – Non-organic Ingredient Affidavit AGR 2252) | | |
| <input type="checkbox"/> GMO testing | <input type="checkbox"/> Other (please specify): | | |
| <input type="checkbox"/> Letters from manufacturers | | | |
| 1a. Please describe how often your company obtains updated non-GMO, non-sewage sludge, and non-ionizing radiation documentation: | | | |
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| 2. How does your company documents that an organic ingredient is unavailable in a commercial form when non-organic ingredients are used? Please note this requirement is not applicable to “made with organic ...” products. | | | |
| <input type="checkbox"/> Not Applicable, not processing products with non-organic ingredients or processing aids | <input type="checkbox"/> WSDA Commercial Availability Form (Please see the attached form – Commercial Availability Form AGR 2251) | | |
| <input type="checkbox"/> Purchasing/Sourcing Log | <input type="checkbox"/> Other (please specify): | | |
| <input type="checkbox"/> Letters from manufacturers | | | |
| 2a. Please describe how often your company obtains updated commercial unavailability documentation: | | | |
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| 3. How do you verify organic ingredients or organic products handled by your company are free of volatile synthetic solvents or other synthetic processing aids? (for products labeled as “100% organic” or “organic”) | | | |
| <input type="checkbox"/> Not Applicable, not processing products labeled as “100% organic” or “organic” | <input type="checkbox"/> Obtain Organic Certificate from Accredited Agency | | |
| <input type="checkbox"/> Letters from manufacturers | <input type="checkbox"/> Other (please specify) | | |
| 3a. Please describe how often your company obtains updated volatile synthetic solvents and processing aid documentation: | | | |
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| 4. Are sulfites, nitrates, or nitrites added during the handling or processing or organic products at your facility? | | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. If salt is used in your products, do you have verification that the salt is free from prohibited flowing agents or other prohibited materials? | | | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |

SECTION D. HARVEST AND TRANSPORTATION OF ORGANIC CROPS [NOP 205.103, 205.270, 205.272]

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| 1. Does your company arrange for, or Is your company responsible for, the harvest of organic crops? | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 1a. If “No,” move onto question #2. | | |
| 1b. If “Yes,” how you ensure there are no non-organic crop residues in harvest equipment? | | |
| <input type="checkbox"/> Equipment used for organic crops only <input type="checkbox"/> Equipment is cleaned prior to organic crop harvest or use | | |



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| 1c. Is harvest equipment cleaning documented? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 1d. If "Yes," please indicate what type of cleaning documentation is maintained: <input type="checkbox"/> Clean truck/equipment affidavits <input type="checkbox"/> Clean out records <input type="checkbox"/> Other (please specify) | | |
| 2. Does your company arrange for, or is your company responsible for, the transportation of organic crops? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2a. If "No," move onto question #3. | | |
| 2b. If "Yes," how you ensure there are no non-organic crop residues in transport equipment? <input type="checkbox"/> Equipment used for organic crops only <input type="checkbox"/> Equipment is cleaned prior to organic crop harvest or use | | |
| 2c. Is transport equipment cleaning documented? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2d. If "Yes," please indicate what type of cleaning documentation is maintained: <input type="checkbox"/> Clean truck/equipment affidavits <input type="checkbox"/> Clean out records <input type="checkbox"/> Other (please specify) _____ | | |
| 3. Does your company provide harvest containers to farms for organic products? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3a. If "No," move onto Section E – Shipping – Finished Organic Products. | | |
| 3b. If "Yes," are the containers, <input type="checkbox"/> New <input type="checkbox"/> Used for organic crops only <input type="checkbox"/> Cleaned prior to use <input type="checkbox"/> Lined prior to use | | |
| 3c. How are harvest containers identified as "organic"? | | |
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SECTION E. SHIPPING - FINISHED ORGANIC PRODUCTS [NOP 205.103, 205.270, 205.272]

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| 1. Does your company arrange for finished organic product transport? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 1a. If "No," skip this section and move onto Section F – Quality Assurance | | |
| 1b. If "Yes," have transport companies been notified of organic handling requirements? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. How does your company ensure outgoing transport units are cleaned prior to loading loose, bulk organic products? <input type="checkbox"/> Not Applicable, only packaged products are shipped <input type="checkbox"/> Clean out records <input type="checkbox"/> Clean truck/equipment affidavits <input type="checkbox"/> Other (please specify): | | |
| 3. Are organic products shipped in the same transport units as non-organic products? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3a. If "Yes," please indicate what steps are taken to segregate organic products. <input type="checkbox"/> Use of separate pallets <input type="checkbox"/> Separate area in transport unit <input type="checkbox"/> Organic product shrink wrapped <input type="checkbox"/> Organic product sealed in impermeable containers <input type="checkbox"/> Other (please specify) : | | |



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SECTION F. QUALITY ASSURANCE [NOP 205.103, 205.270, 205.272]

The National Organic Program requires a certified operation to maintain records regarding the handling of organic products. These records must be adapted to the particular business or operation, must fully disclose all activities and transactions of the certified operation in sufficient detail to be readily understood and audited, must be maintained for five years, and must be sufficient to demonstrate compliance with the National Organic Program Rule.

In order to gain a better understanding of your company and the quality assurance systems, or recordkeeping systems, in place at your facility, please complete the following section.

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| 1. Do you have standard operating procedures for organic processing and/or handling? If "Yes," please attach a copy. | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Do you have a Quality Assurance program in place? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2a. If "Yes," please indicate what type of program. <input type="checkbox"/> ISO <input type="checkbox"/> HACCP <input type="checkbox"/> Total Quality Management <input type="checkbox"/> Other (please specify): | | |
| 3. Are any outside quality assessment services used (i.e. EuropGap, AIB)? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3a. If "Yes," please list the name of the company: | | |
| 4. Does your company conduct product testing? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4a. If "Yes," please list the types of quality or residue testing conducted: | | |
| | | |
| 5. Are ingredient samples retained? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 6. Are finished product samples retained? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 7. Do you have a recall system in place? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 8. Does your company conduct internal audits? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 9. Can your record keeping system track the finished product back to all ingredients? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 10. Can your record keeping system balance organic ingredients in and organic products out? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 11. The NOP requires records related to an organic product be maintained for five years. Please describe your system for maintaining records related to organic products: | | |
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